

Exhibit A

SUMMARY OF DISCOVERY SOUGHT TO DATE

The Parties provide the below summary of the discovery conducted so far in this matter:

- A. Bifurcation of Discovery:** Discovery has been bifurcated between liability and damages.
- B. EEOC's First Set of Discovery to Dollar General:** On **December 17, 2013**, the EEOC served its first set of interrogatories and first request for production of documents on Dollar General. On **February 21, 2014**, Dollar General served its answers and objections to EEOC's first set of interrogatories and its responses and objections to EEOC's first request for production of documents. Related to the Interrogatories, Dollar General objected to the EEOC propounding more than 25 requests, when considering the discrete sub-parts of the interrogatories served. On **October 24, 2014**, Dollar General served its first amended responses and objections to the EEOC's first request for production, and on **November 11, 2014**, Dollar General served its first amended answers and objections to the EEOC's first set of interrogatories.
1. **Document production:** Dollar General, to date, has produced close to 3,000 documents in response to the EEOC's First Request for Production of documents, and have produced non-identifying electronic data on approximately 60,000 applicants who were denied employment due to negative results of criminal background checks from 2004-2009 (including each applicant's employee identification number; city, state, zip code of employment and residence; job code; hire date; termination date; and the last four digits of his or her social security numbers). The EEOC asks the Court to compel Dollar General to produce additional documents in the EEOC's motions to compel. Dollar General has agreed that it will provide a privilege log by **March 31, 2015**.
- C. Dollar General's First Set of Discovery to the EEOC:** On **April 21, 2014**, Dollar General served its first set of interrogatories and its first request for production of documents. On **May 21, 2014**, the EEOC served its responses to Dollar General's first set of interrogatories and first request for production of documents. On **July 31, 2014**, the EEOC served its first supplemental responses to Dollar General's first request for production of documents.
- D. EEOC's Second Set of Discovery to Dollar General:** On **December 2, 2014**, the EEOC served its first requests to admit, its second request for production of documents, and its second set of interrogatories. On **January 8, 2015**, Dollar General served its responses and objections to EEOC's first requests to admit, its answers and objections to EEOC's second set of interrogatories, and its responses and objections to EEOC's second request for production of documents. On **March 4, 2015**, Dollar General served its first amended objections and responses to EEOC's first requests to admit.
- E. Third Party Discovery By the EEOC:** On **June 30, 2014**, the EEOC issued a Rule 30(b)(6) deposition subpoena to GIS. On **November 3, 2014**, EEOC served third-party subpoenas on GIS and Equifax. The third-party vendors are waiting for a ruling from the District

Court as to the scope of permitted discovery before completing data production. Moreover, the EEOC is working on deposition dates for GIS's corporate representative.

F. Store Manager Depositions Noticed By the EEOC: On **January 20, 2015**, the EEOC served its notice of deposition for two Dollar General Store Managers. In response, Dollar General filed a Motion for Protection.

G. Discovery Deadline Related to Issues of Liability: On **May 15, 2015**, fact discovery as to liability is currently set to close. The Parties anticipate that more time may be required to complete this phase of discovery.